IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TALECRIS BIOTHERAPEUTICS, INC., and BAYER HEALTHCARE LLC,	)	
Plaintiffs,	)	
v.	)	**C.A. No. 05-349-GMS**
BAXTER INTERNATIONAL INC., and BAXTER HEALTHCARE CORPORATION,	)	**Jury Trial Demanded**
Defendants.	)	
BAXTER HEALTHCARE CORPORATION,	)	
Counterclaimant,	)	
v.	)	
TALECRIS BIOTHERAPEUTICS, INC., and BAYER HEALTHCARE LLC,	)	
Counterdefendants.	)	

PLAINTIFFS' SECOND NOTICE OF DEPOSITION TO BAXTER INTERNATIONAL INC. AND BAXTER HEALTHCARE CORPORATION PURSUANT TO FED.R.CIV.P. 30(b)(6)

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that, pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, beginning on September 20, 2006 at 9:30 a.m., at the offices of Bird & Bird, Avenue d'Auderghem 22-28, Brussels 1040, Belgium, counsel for Plaintiffs Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC will take the deposition upon oral examination of Defendant Baxter International Inc. by and through one or more of its officers, directors, or managing agents, or other persons who are designated and consent to testify on its behalf, with respect to the matters

described in Schedule A hereto. The person or persons so designated shall testify as to matters known or reasonably available to Defendant.

The deposition will be taken before an officer authorized to administer oaths and will continue from hour to hour and day to day until completed. You are invited to attend and cross-examine. Please be advised that this deposition may be recorded by videotape in addition to stenographic recording, which will include the use of LiveNote real time transcription.

August 31, 2006

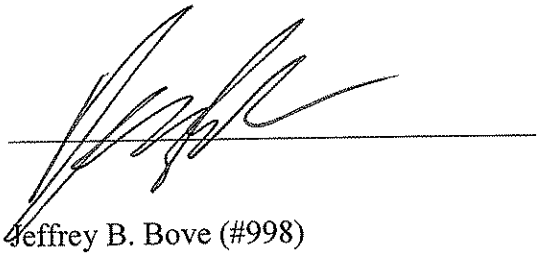

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EXHIBIT A

DEFINITIONS

Except as otherwise provided herein, Plaintiffs hereby incorporate by reference all definitions and instructions set forth in Plaintiffs' First Set of Requests for Documents and Things and Plaintiffs' First Set of Interrogatories (Nos. 1–8) as though fully set forth herein.

1. **"FDA"** means the United States Food and Drug Administration, any of its subdivision agencies, including the Center for Biologics Evaluation and Research, and any foreign regulatory entity charged with government regulatory authority over immune globulin, plasma-derived products, or biological products or intended or used for human or animal administration.

DEPOSITION CATEGORIES

1. The manufacturing processes for GAMMAGARD® S/D, GAMMAGARD® Liquid, and KIOVIG, specifically including all portions of the manufacturing process that are non-continuous, and any periods where products or intermediates are held prior to a future step, including, but not limited to, the identity of any products or product intermediates that are held, including the conditions under which the products or intermediates are held, and the effects such hold periods have on the physical or chemical properties of the product or intermediate.

CERTIFICATE OF SERVICE

I, JEFFREY B. BOVE, ESQUIRE, do hereby certify that I caused a true copy of the foregoing document **PLAINTIFFS' SECOND NOTICE OF DEPOSITION TO BAXTER INTERNATIONAL INC. PURSUANT TO FED.R.CIV.P. 30(b)(6)**, to be served upon the below listed in the manner indicated on August 31, 2006.

Via Hand Delivery and E-Mail
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By: _____
Jeffrey B. Bove, Esquire (# 998)

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